UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	**CR. NO. 7:16-CR-1525**
	§	
DANIEL RAMIREZ-TOBIAS	§	

DEFENDANT'S "UNOPPOSED" MOTION FOR CONTINUANCE OF SENTENCING DATE

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES DANIEL RAMIREZ-TOBIAS, defendant in the above entitled and numbered cause, by and through his attorney **RICHARD H GARCIA**, and makes this his first request for a continuance for his Sentencing date in this cause and would show the Court as follows:

I.

This case is set for Sentencing May 15, 2017 at 10:00 a.m., before this Honorable Court.

II.

Defendant's counsel just recently received Defendant's medical report from Dr. Vittorio Puente. Defendant's counsel is requesting additional time for preparation and also possible filing of additional objections. For these reasons, Defendant's counsel respectfully requests a (60) sixty days continuance or at least a (30) thirty days continuance or a date convenient for this court consistent with this request.

III.

A.U.S.A. Alejandro Benavides is unopposed as to the filing of this motion.

IV.

This Motion is not made for purposes of delay but only so that justice may be done and to provide defendant the effective assistance of counsel.

WHEREFORE, PREMISES CONSIDERED, Defendant prays unto the Court this "Unopposed" Motion for Continuance be granted, and the present sentencing date be continued to (60) sixty days or at least a (30) thirty days or to a date which is convenient for this Court consistent with this Request.

Respectfully Submitted,

/S/RICHARD H. GARCIA
RICHARD H. GARCIA
State Bar No. 07643500
Federal I.D. No. 1584

LAW OFFICES OF
GARCIA, QUINTANILLA & PALACIOS
5526 North 10th Street
McAllen, Texas 78504
(956) 682-9477 Telephone
(956) 682-0223 Facsimile
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this the 8th day of May, 2017 I electronically filed Defendant's "Unopposed" Motion For Continuance of the Sentencing date with the Clerk of the Court using the CM/ECF system which will automatically send e-mail notification of such filing to the AUSA Alejandro Benavides and to all counsels of record.

/S/RICHARD H. GARCIA
RICHARD H. GARCIA

CERTIFICATE OF CONFERENCE

I hereby certify that I have consulted with the AUSA Alejandro Benavides with reference to Defendant's Motion for Continuance of the Sentencing date and he was unopposed to the Court granting this continuance.

/S/RICHARD H. GARCIA
RICHARD H. GARCIA